JURY TRIAL

DEMANDED

SOUTHERN DISTRICT OF NEW YORK	
SYLVINA JEAN CLAVIEN and RAPHAEL DANIS,	
MARIANTE CENTER VIENTA CONTRA INVESTIGACIÓN DE LA CANON	ANSWER TO
Plaintiffs,	CROSS-CLAIM
v.	08 CIV 3566 (PKL)
GREYHOUND LINES, INC., and "JOHN DOE", that	[Related to
name being fictitious, his true name being unknown to	06 CIV 13371 (PKL)]
Plaintiff,	

Defendants.

GREYHOUND LINES, INC.,

Third-Party Plaintiff,

٧.

MOTOR COACH INDUSTRIES, INC., UGL UNICCO, Formerly Known As UNICCO Service Company and THE GOODYEAR TIRE & RUBBER COMPANY,

## Third-Party Defendants.

Defendant/Third-Party Plaintiff, GREYHOUND LINES, INC., by its attorneys, FABIANI COHEN & HALL, LLP, as and for an Answer to the Cross-Claim of Third-Party Defendant, MOTOR COACH INDUSTRIES, INC. ("MCI"), sets forth, upon information and belief, the following:

## AS AND FOR AN ANSWER TO THE CROSS-CLAIM AGAINST GREYHOUND LINES, INC.

ONE HUNDRED TWENTY-NINTH: Defendant/Third-Party Plaintiff, Greyhound Lines, Inc., denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph No. "129" of the Third-Party Defendant, MCI's Answer to

Third Party Complaint Dated June 9, 2008, except denies all allegations set forth in Paragraph Nos. "1" through "128" of Third-Party Defendant, MCI's Answer to Third-Party Complaint dated June 9, 2008 to the extent the allegations are made against Greyhound Lines, Inc. and begs leave to refer to all relevant agreements for their complete terms and conditions.

ONE HUNDRED THIRTIETH: Defendant/Third-Party Plaintiff, Greyhound Lines, Inc., denies each and every allegation contained in Paragraph No. "130" of the Third-Party Defendant, MCI's Answer to Third-Party Complaint dated June 9, 2008.

ONE HUNDRED THIRTY-FIRST: Defendant/Third-Party Plaintiff, Greyhound Lines, Inc., denies each and every allegation contained in Paragraph No. "131" of the Third-Party Defendant, MCI's Answer to Third-Party Complaint dated June 9, 2008.

WHEREFORE, defendant/third-party plaintiff, GREYHOUND LINES, INC., demands:

- 1. Judgment dismissing the Plaintiff's Complaint;
- 2. Judgment dismissing MCI's Cross-Claims against Defendant/Third-Party Plaintiff, GREYHOUND LINES, INC.
  - 3. Together with the costs and disbursements of this action.

Dated:

New York, New York July 1, 2008

Yours, etc.,

FABIANI COHEN & HALL, LLP

Kevin B. Pollak (KBP 6098)

Attorneys for Defendant/Third-Party Plaintiff

GREYHOUND LINES, INC.

570 Lexington Avenue, 4th Floor

New York, New York 10022

(212) 644-4420

NOVACK BURNBAUM CRYSTAL LLP TO: Attorneys for Third-Party Defendant MOTOR COACH INDUSTRIES, INC. 300 East 42<sup>nd</sup> Street New York, New York 10017 (212) 682-4002

> ARNSTEIN & LEHR LLP **Attorneys for Third-Party Defendant** MOTOR COACH INDUSTRIES, INC. 120 South Riverside Plaza, Suite 1200 Chicago, Illinois 60606 (312) 876-7100

LAW OFFICES OF NEIL MOLDOVAN **Attorney for Plaintiffs** SYLVINA JEAN CLAVIEN and RAPHAEL DANIS One Old Country Road - Suite 270 Carle Place, New York 11514 (516) 294-3300

TAUB & MARDER Attorneys for Plaintiffs TERESITA SANTIAGO, RAMON LORENZO and TERESITA SANTIAGO, as mother and natural guardian of KAREN SANTIAGO DIAZ and HENRY LORENZO. infants; MARIA MERCEDES ROSARIO BRETON, FABIAN GARCIA and PAOLA GARCIA 450 Seventh Avenue, 37th Floor New York, New York 10123 (212) 967-1122

RICH & RICH, P.C. Attorneys for Plaintiff **ZIBO WANG** 30 Vesey Street New York, New York 10007 (212) 406-0440

KREINDLER & KREINDLER Attorneys for Plaintiffs KIRSTEN ANDERSON, CHRISTIAN YOPA, ABI-SARA MACHOLD and CINDYLYN LaMARCHE 100 Park Avenue, 18th Floor New York, New York 10017 (212) 687-8181

GOLDBERG SEGALLA, LLP **Attorneys for Plaintiff** LAURE BOUDET 5789 Widewaters Parkway Syracuse, New York 13214 (315) 413-5400

RUBENSTEIN & RYNECKI, ESQS. **Attorneys for Plaintiffs BETTY DORCE EXUME, as Administratrix** of the Estate of ANTONIDE DORCE, deceased, and BETTY DORCE EXUME, individually, JACQUELIN BERTRAND and MARIE LILIANE MILARD 16 Court Street, Suite 1717 Brooklyn, New York 11241 (718) 522-1020

NORMAN LISS, ATTORNEYS-AT-LAW, P.C. **Attorneys for Plaintiffs** SHERRY ANN GEORGE, SHERRY ANN GEORGE, as Mother and Natural Guardian of VOSHONA GEORGE, Infant, and SHERRY ANN GEORGE and ALLISON IDOHOU, as Co-Administrators of the ESTATE OF DOREEN GEORGE, Deceased 200 West 57th Street New York, New York 10019 (212) 586-6165

VALAD and VECCHIONE PLLC **Attorneys for Plaintiffs** CHEIKH SIDY MOHAMED TAMBADOU and OURY CISSE, Individually and as Co-Liquidators of the Estate of SOULEYMANE TAMBADOU, deceased, 3863 Plaza Drive Fairfax, VA 22030 (703) 352-4800

THE LIETZ LAW FIRM, PLLC Attorneys for Plaintiffs CHEIKH SIDY MOHAMED TAMBADOU and OURY CISSE, Individually and as Co-Liquidators of the Estate of SOULEYMANE TAMBADOU, deceased, 888 16th Street North West Suite 800 Washington, DC 20006 (202) 349-9869

E. STEWART JONES, PLLC Attorney for Plaintiff CINDYLYN LAMARCHE 28 Second Street Troy, New York 12181 (518) 274-5820

OFFICE OF JAY H. TANENBAUM Attorneys for Plaintiff LIONEL CADELIS 110 Wall Street, 16th Floor New York, New York 10005 (212) 422-1765

CHAPMAN, ZARANSKY LAW FIRM **Attorneys for Plaintiff** LIONEL CADELIS 114 Old Country Road, Suite 680 Mineola, New York 11501 (516) 741-6601 ext. 226

LAW OFFICE OF EDWARD P. RYAN **Attorneys for Plaintiffs** MAMADOU SAIDOU BAH and GNALEN BAH 38 Eagle Street Albany, New York 12207 (518) 465-2488

LAW OFFICE OF MARK SCHNEIDER Attorneys for Plaintiff LAUREN BICKFORD-BUSHEY **57 Court Street** Plattsburgh, New York 12901 Attention: Mark Schneider, Esq. (518) 566-6666

HERRICK, FEINSTEIN, LLP Attorneys for Defendant THE GOODYEAR TIRE & **RUBBER COMPANY** 2 Park Avenue New York, New York 10016 (212) 592-1400

QUIRK and BAKALOR, P.C. Attorneys for Third-Party Defendant UGL UNICCO 845 Third Avenue, 15<sup>th</sup> Floor New York, New York 10022 (212) 319-1000

389665.1

Sylvina Jean Clavien, et al. v. Greyhound Lines, Inc., et al. v. Motor Coach Industries, Inc., et al. Civil Action No.: 08 CIV 3566 (PKL)

Our File No. 818.34464

## CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing ANSWER TO CROSS-CLAIM was served via CM/ECF and First-Class Mail, postage prepaid, this 1<sup>st</sup> day of July, 2008, to:

NOVACK BURNBAUM CRYSTAL LLP 300 East 42nd Street New York, New York 10017

ARNSTEIN & LEHR LLP 120 South Riverside Plaza, Suite 1200 Chicago, Illinois 60606

LAW OFFICES OF NEIL MOLDOVAN One Old Country Road - Suite 270 Carle Place, New York 11514

TAUB & MARDER 450 Seventh Avenue, 37th Floor New York, New York 10123

RICH & RICH, P.C. 30 Vesey Street New York, New York 10007

KREINDLER & KREINDLER 100 Park Avenue, 18th Floor New York, New York 10017

GOLDBERG SEGALLA, LLP 5789 Widewaters Parkway Syracuse, New York 13214

RUBENSTEIN & RYNECKI, ESQS. 16 Court Street, Suite 1717 Brooklyn, New York 11241

NORMAN LISS, ATTORNEYS-AT-LAW, P.C. 200 West 57th Street New York, New York 10019 VALAD and VECCHIONE PLLC 3863 Plaza Drive Fairfax, VA 22030

THE LIETZ LAW FIRM, PLLC 888 16th Street North West Suite 800 Washington, DC 20006

E. STEWART JONES, PLLC 28 Second Street Troy, New York 12181

OFFICE OF JAY H. TANENBAUM 110 Wall Street, 16th Floor New York, New York 10005

CHAPMAN, ZARANSKY LAW FIRM 114 Old Country Road, Suite 680 Mineola, New York 11501

LAW OFFICE OF EDWARD P. RYAN 38 Eagle Street Albany, New York 12207

LAW OFFICE OF MARK SCHNEIDER 57 Court Street Plattsburgh, New York 12901

HERRICK, FEINSTEIN, LLP 2 Park Avenue New York, New York 10016

QUIRK and BAKALOR, P.C. 845 Third Avenue, 15th Floor New York, New York 10022

Kevin B. Pollak (6098)

Sworn to before me this 1st day of July, 2008.

**NOTARY PUBLIC** 

No. 01 FE5042920

Qualified in New York County

Commission Expires September 05, 2011

SOUTHE	8-cv-03566-PKL Document 27 STATES DISTRICT COURT ERN DISTRICT OF NEW YORK		Page 8 of 8	
	A JEAN CLAVIEN and RAPHAEL DANIS		·	
	Plaintiffs,	0	08 CIV 3566 (PKL)	
that name	v. DUND LINES, INC., and "JOHN DOE", e being fictitious, his true name being		[Related to CIV 13371 (PKL)] TRIAL DEMANDED	
		X		
GREYHO	OUND LINES, INC.,	N 4 1300		
Third-Party Plaintiff,				
UNICCO Company RUBBER	COACH INDUSTRIES, INC., UGL , Formerly Known As UNICCO Service , and THE GOODYEAR TIRE & COMPANY,  Third-Party I			
<del></del>	ANSWER TO CR	OSS-CLAIM	autonio anti-	
	FABIANI COHEN Attorneys for Defendant/ GREYHOUND I 570 Lexington Ave New York, New (212) 644-44	Third-Party Plaintiff JNES, INC. July 4 <sup>th</sup> Floor York 10022	:	
To: Attorn Sir(s):	ney(s) for:			
P) copy	LEASE TAKE NOTICE that a	of which the wit	hin is a (true) (certified)	
tumud .	NOTICE OF ENTRY was duly entered in the witi	hin named court on	2008	
	NOTICE OF SETTLEMENT will be presented fonce of the judges of the within named court at the C		at o'clock	
Dated:				

Yours, etc.,
FABIANI COHEN & HALL, LLP
Attorneys for Defendant/Third-Party Plaintiff
570 Lexington Avenue, 4th Floor
New York, New York 10022
(212) 644-4420

To:

Attorney(s) for: